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DOH 121577-121579
DOH 121571-121574
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DOH 118843-118843
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DOH 118663-118664
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DOH 118635-118643
DOH 118602-118602
DOH 118598-118601

Bates No.
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DOH 118463-118467
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DOH 118426-118426
DOH 118418-118423
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DOH 118369-118370
DOH 118102-118103
DOH 118069-118070
DOH 117824-117824
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Bates No.
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OMH 22737-22738
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OMH 30677-30678
OMH 30674-30676
OMH 30672-30673
OMH 30610-30611
OMH 28337-28337
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OMH 28326-28326
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OMH 28312-28312
OMH 28292-28297
OMH 28256-28268
OMH 28255-28255
OMH 28254-28254
OMH 28248-28251

Bates No.
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OMH 28223-28224
OMH 28211-28222
OMH 28208-28210
OMH 28203-28204
OMH 28201-28202
OMH 28193-28196
OMH 28188-28191
OMH 28182-28187
OMH 28172-28181
OMH 28155-28171
OMH 28149-28154
OMH 28143-28148
OMH 28137-28142
OMH 28131-28136
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OMH 28125-28126
OMH 28121-28124
OMH 28113-28120
OMH 28108-28109
OMH 28070-28082
OMH 28068-28069
OMH 28066-28067
OMH 28063-28065
OMH 27382-27383

Bates No.
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DOH 107614-107618
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OMH 24178-24178
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OMH 25201-25201
OMH 25194-25194
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OMH 25126-25126
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Bates No.
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Bates No.
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Bates No.
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Bates No.
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DOH 64682-64695
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DOH 64361-64367

Bates No.
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DOH 64162-64168
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Bates No.
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DOH 63589-63592
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DOH 63381-63387
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DOH 63260-63319
DOH 63253-63257

Bates No.
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DOH 110416-110418
DOH 110059-110061
DOH 109985-109992
OMH 8640-8642
DOH 104991-105004
DOH 104979-104990
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Bates No.
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DOH 102068-102068
DOH 102067-102067
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PWBM 175-179
PWBM 171-174
PWBM 161-168
PWBM 154-160
PWBM 147-153
PWBM 140-146
PWBM 133-139
PWBM 126-132
PWBM 120-125

Bates No.
PWBM 114-119
PWBM 107-113
PWBM 101-106
PWBM 95-100
PWBM 89-94
PWBM 84-88
PWBM 78-83
PWBM 73-77
PWBM 25-71
PWBM 22-23
PWBM 19-21
PWBM 14-14
PWBM 13-13
PWBM 12-12
PWBM 11-11
PWBM 3-10
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OMH 16859-16860
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DOH 18904-18905
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DOH 19378-19389
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Bates No.
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DOH 84250-84259
DOH 84243-84243
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DOH 55192-55228
DOH 55187-55188
DOH 55145-55186
OMH 9822-9822

Bates No.
OMH 9821-9821
OMH 9820-9820
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DOH 19606-19742
DOH 19073-19083
DOH 19003-19004
DOH 18877-18882
DOH 19042-19058
DOH 1510-1527
DOH 1494-1495
DOH 1496-1501
DOH 1468-1470
DOH 1410-1411
DOH 1397-1398
DOH 1401-1406
DOH 1376-1396
DOH 1443-1459
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DOH 81174-81206
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Bates No.
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DOH 112344-112373
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OMH 30190-30192
OMH 30188-30188
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OMH 30067-30086
OMH 29953-29953
OMH 29949-29950
OMH 29945-29947
OMH 29823-29823
OMH 29792-29792
OMH 29778-29778
OMH 29680-29682

Bates No.
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DOH 118148-118148
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OMH 32395-32396
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DOH 118705-118705
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DOH 118097-118098
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Bates No.
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OMH 28192-28192

Bates No.
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Bates No.
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DOH 124731-124735
DOH 124368-124373
OMH 28835-28836
DOH 111283-111290
OMH 28744-28750
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DOH 111111-111125
DOH 111103-111110
DOH 111098-111102
DOH 110719-110726
DOH 110714-110718
DOH 110712-110713
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DOH 125188-125189

Bates No.
DOH 125152-125164
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Bates No.
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OMH 28810-28812
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OMH 979-991
OMH 957-978
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OMH 17415-17423
DOH 100730-100733
OMH 32387-32389
OMH 24361-24361
OMH 25123-25123
OMH 28937-28938

Bates No.
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DOH 93914-93917
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DOH 116697-116698
DOH 118709-118709
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OMH 33705-33705
OMH 33381-33382
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OMH 33327-33352
OMH 32601-32604
OMH 32474-32477
OMH 32394-32394
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OMH 32382-32386
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Bates No.
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DOH 125813-125814
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OMH 31275-31276
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OMH 31028-31028
OMH 30998-30998
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OMH 30679-30680
OMH 30608-30609
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OMH 23019-23019
OMH 23002-23004
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OMH 28236-28242
OMH 28197-28200
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OMH 27770-27770
OMH 27414-27414

Bates No.
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Bates No.
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DOH 119076-119078
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DOH 126753-126753
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Bates No.
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Bates No.
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DOH 110338-110340
DOH 110334-110337
DOH 110330-110333
DOH 110327-110329
DOH 110323-110326
DOH 110319-110322
DOH 110316-110318
DOH 110313-110315
DOH 110309-110312
DOH 110084-110089
DOH 110081-110083
DOH 110076-110080
DOH 110072-110075
DOH 110067-110071
DOH 110065-110066
DOH 110062-110064
DOH 110055-110058
DOH 110045-110054
DOH 110039-110044
DOH 110035-110038
DOH 110032-110034
DOH 110028-110031
DOH 110017-110027
DOH 110012-110016

Bates No.
DOH 110006-110011
DOH 110003-110005
DOH 110000-110002
DOH 109997-109999
DOH 109993-109996
DOH 109979-109984
DOH 103995-104020
DOH 103969-103994
DOH 103943-103968
DOH 102168-102169
DOH 102131-102131
DOH 102115-102116
DOH 102112-102114
DOH 102109-102111
OMH 29219-29238
OMH 291 62-291 62
OMH 28376-28376
DOH 95934-95935
DOH 95933-95933
MFY 260-265
MFY 255-258
MFY 230-254
MFY 171-180
PWBM 170-170
PWBM 15-18
OMH 16878-16879
OMH 16833-16834
DOH 84616-84621
OMH 3156-3218
OMH 3261-3270

Bates No.
OMH 6244-6244
OMH 11340-11345
OMH 10320-10328
OMH 9211-9218
OMH 551-551
DOH 84673-84680
DOH 11967-11968
DOH 11957-11958
DOH 84573-84596
DOH 11973-11977
DOH 84598-84599
DOH 84560-84572
DOH 84557-84559
DOH 84549-84551
DOH 84539-84542
DOH 84375-84375
DOH 84374-84374
DOH 84365-84366
DOH 84364-84364
DOH 84360-84362
DOH 84303-84305
DOH 84285-84287
DOH 84276-84278
DOH 84275-84275
DOH 84244-84249
DOH 84241-84242
DOH 84239-84240

Bates No.
OMH 11337-11339
OMH 3328-3340
OMH 3258-3260
OMH 3253-3257
OMH 3237-3242
OMH 3231-3236
OMH 3223-3230
OMH 3219-3221
OMH 3149-3155
OMH 3141-3148
OMH 3129-3140
OMH 9146-9149
OMH 3354-3356
OMH 2652-2652
OMH 2632-2634
OMH 2631-2631
DOH 55274-55284
OMH 9763-9764
OMH 9761-9761
OMH 9759-9760
OMH 9727-9727
OMH 9732-9732
OMH 9728-9728
DOH 11855-11907
DOH 11386-11724
DOH 11199-11300
DOH 1471-1490

Bates No.
DOH 1502-1509
DOH 1491-1492
OMH 372-384
OMH 28754-28764
OMH 1023-1037
OMH 17531-17539
OMH 22040-22074
OMH 24681-24703
DOH 112245-112252
DOH 113049-113060
DOH 86318-86568
DOH 84500-84506
DOH 18215-18218
OMH 397-414
DOH 84490-84499
DOH 84485-84489
DOH 84479-84484
DOH 84439-84478
DOH 84295-84301
DOH 84615-84615
DOH 84367-84372
DOH 84317-84322
DOH 12617-12690
OMH 17276-17287
DOH 112848-112851
DOH 84342-84359

75. Documents relating to Park Inn

Bates No.
DOH 127254-127255
DOH 2240-2260
DOH 128664-128669
OMH 7574-7576
OMH 7224-7228
OMH 11026-11026
DOH 124403-124407
OMH 29205-29206
OMH 28694-28699
DOH 125103-125127
DOH 125549-125571
DOH 83310-83328
DOH 17361-17362
DOH 17388-17394
DOH 17402-17439
DOH 17395-17401
DOH 2176-2198
DOH 2154-2175
DOH 2133-2153
DOH 2199-2223
DOH 2261-2274
DOH 2124-2132
DOH 2225-2239
DOH 2122-2123
DOH 2082-2117
DOH 2059-2081
DOH 2046-2052
DOH 2023-2045
DOH 2054-2058
DOH 445-482

Bates No.
DOH 431-437
DOH 406-430
DOH 438-444
OMH 13190-13207
OMH 12557-12579
OMH 20364-20367
DOH 126546-126549
OMH 25121-25121
DOH 17363-17387
OMH 29811-29812
DOH 116518-116519
OMH 28317-28318
OMH 21041-21041
OMH 21040-21040
OMH 20368-20370
OMH 20338-20357
OMH 20330-20330
DOH 107791-107797
DOH 106609-106621
DOH 106591-106608
DOH 106570-106590
OMH 24388-24388
DOH 127102-127111
DOH 126633-126633
DOH 104297-104313
DOH 104261-104271
DOH 104246-104260
OMH 6326-6349
DOH 85710-85714
DOH 85597-85600

Bates No.
OMH 11326-11330
OMH 7212-7217
OMH 7749-7759
OMH 7738-7748
OMH 7617-7627
OMH 7512-7522
DOH 2120-2121
DOH 2118-2119
DOH 127323-127324
OMH 19738-19741
DOH 117395-117400
OMH 19745-19748
DOH 119934-119937
DOH 81598-81612
OMH 6305-6305
DOH 127252-127253
DOH 85601-85606
OMH 11340-11345
OMH 11331-11335
DOH 122532-122533
DOH 123945-123945
DOH 110959-110963
OMH 19714-19724
OMH 19804-19810
OMH 19843-19861
DOH 93802-93809
OMH 18031-18034
DOH 128702-128702
DOH 128699-128699
DOH 128752-128752

Bates No.	Bates No.	Bates No.
DOH 128751-128751	DOH 110584-110590	OMH 19937-19937
DOH 116513-116513	DOH 110565-110569	OMH 21961-21961
OMH 32580-32588	DOH 102173-102173	OMH 30997-30997
OMH 32579-32579	DOH 101954-101954	OMH 21037-21038
OMH 32567-32578	OMH 10866-10876	DOH 122046-122046
OMH 32564-32566	DOH 83309-83309	DOH 119095-119097
OMH 32560-32563	DOH 59820-59820	DOH 119059-119059
OMH 32556-32557	DOH 17360-17360	DOH 119005-119013
OMH 32238-32242	DOH 2224-2224	DOH 126846-126847
DOH 125961-125961	DOH 2053-2053	DOH 126449-126450
DOH 103621-103622	DOH 405-405	DOH 94057-94058
OMH 21451-21452	OMH 21416-21417	DOH 103995-104020
OMH 28306-28306	DOH 110971-110977	DOH 102115-102116
OMH 27799-27800	DOH 110955-110958	DOH 102112-102114
OMH 21174-21174	DOH 110915-110954	DOH 102109-102111
OMH 21173-21173	DOH 110875-110914	OMH 28376-28376
OMH 21172-21172	OMH 19964-19966	OMH 6906-6908
OMH 21042-21047	OMH 19815-19841	OMH 6298-6301
OMH 21039-21039	DOH 102928-102935	OMH 18848-18850
OMH 21034-21034	OMH 18219-18219	OMH 22040-22074
OMH 21032-21032	DOH 100725-100729	OMH 20331-20333
OMH 20721-20721	OMH 19726-19736	DOH 95807-95812
OMH 20336-20337	OMH 19749-19768	DOH 95635-95636
OMH 20335-20335	DOH 116731-116732	DOH 103969-103994
OMH 20298-20329	DOH 116697-116698	DOH 103943-103968
OMH 20275-20297	DOH 118709-118709	DOH 102168-102169
OMH 20274-20274	OMH 33710-33710	DOH 85685-85709
OMH 20273-20273	OMH 33327-33352	OMH 415-434
OMH 20058-20092	DOH 118771-118771	OMH 397-414
DOH 110591-110596	OMH 19939-19940	DOH 85658-85663

Bates No.
DOH 85607-85620
OMH 11337-11339

Bates No.
DOH 12617-12690
DOH 85664-85684

Bates No.
DOH 85621-85657

76. Documents relating to Anna Erika

Bates No.
DOH 76267-76290
DOH 76235-76266
DOH 76233-76234
DOH 76221-76232
DOH 76219-76220
DOH 76217-76218
DOH 76215-76216
DOH 76213-76214
DOH 76211-76212
DOH 76209-76210
DOH 76207-76208
DOH 76196-76206
DOH 76195-76195
DOH 75978-76035
DOH 75947-75977
DOH 77589-77589
DOH 77415-77418
DOH 77277-77277
DOH 77199-77227
OMH 13818-13834
OMH 13807-13807
DOH 114116-114160
DOH 113853-113866
OMH 29051-29052

Bates No.
OMH 28776-28776
OMH 28710-28743
OMH 13797-13806
CIAD 234-253
DOH 128001-128001
DOH 127968-127968
DOH 127914-127914
OMH 13021-13039
OMH 12697-12715
OMH 18298-18302
OMH 18019-18021
DOH 120916-120917
DOH 120911-120911
OMH 24287-24287
DOH 114194-114219
OMH 24723-24723
OMH 28414-28415
DOH 114725-114767
DOH 114341-114355
DOH 114168-114170
DOH 113820-113852
DOH 113778-113798
DOH 113743-113759
DOH 114871-114875

Bates No.
DOH 71771-71771
DOH 71772-71773
DOH 1146041-14626
DOH 114092-114103
DOH 114082-114091
DOH 114047-114067
DOH 128370-128370
DOH 128271-128271
DOH 128181-128181
OMH 33147-33162
OMH 32042-32042
OMH 32041-32041
DOH 117467-117467
DOH 117455-117455
DOH 117395-117400
DOH 117319-117319
DOH 116961-116962
DOH 126334-126334
DOH-126240-126240
DOH 126213-126213
DOH 126206-126208
DOH 126181-126192
DOH 126162-126162
DOH 126101-7126161

Bates No.	Bates No.	Bates No.
DOH 126159-126159	DOH 114903-114904	DOH 114370-114391
DOH 126029-126029	DOH 114901-114902	DOH 114365-114369
OMH 22783-22799	DOH 114899-114900	DOH 114356-114364
OMH 22766-22782	DOH 114897-114898	DOH 114331-114340
OMH 31235-31235	DOH 114895-114896	DOH 114316-114330
DOH 107869-107872	DOH 114893-114894	DOH 114314-114315
DOH-107619-107638	DOH 114889-114892	DOH 114312-114313
DOH 107572-107601	DOH 114887-114888	DOH 114310-114311
DOH 109684-109689	DOH 1148857-114886	DOH 114307-114308
DOH 109472-109483	DOH 1148837-114884	DOH 114304-114305
OMH 24263-24263	DOH 114881-114882	DOH 114287-114303
OMH 24248-24248	DOH 114879-114880	DOH 114275-114286
OMH 25137-25137	DOH 114876-114878	DOH 114260-114274
OMH 25125-25125	DOH 114869-114870	DOH 114241-114259
DOH 122290-122307	DOH 114867-114868	DOH 114231-114240
DOH 121346-121349	DOH 114864-114866	DOH 114220-114230
DOH 120240-120240	DOH 114862-114863	DOH 114191-114193
DOH 119057-119058	DOH 114860-114861	DOH 114175-114190
DOH 119035-119037	DOH 114858-114859	DOH 114171-114173
DOH 119034-119034	DOH 114856-114857	DOH 114161-114167
DOH 126848-126869	DOH 114844-114855	DOH 114104-114114
DOH 126663-126663	DOH 114840-114843	DOH 114080-114081
DOH 114919-114921	DOH 114828-114839	DOH 114079-114079
DOH 114916-114918	DOH 114798-114827	DOH 114074-114078
DOH 114914-114915	DOH 114768-114797	DOH 114068-114073
DOH 114913-114913	DOH 114686-114724	DOH 114012-114046
DOH 114911-114912	DOH 114658-114685	DOH 114006-114011
DOH 114909-114910	DOH 114627-114657	DOH 114001-114005
DOH 114907-114908	DOH 114404-114603	DOH 113993-114000
DOH 114905-114906	DOH 114392-114403	DOH 113978-113992

Bates No.	Bates No.	Bates No.
DOH 113953-113977	DOH 84123-84124	DOH 73323-73335
DOH 113907-113952	OMH 11317-11322	DOH 73294-73295
DOH 113905-113906	DOH 55079-55101	DOH 73361-73377
DOH 113881-113904	OMH 9765-9766	DOH 73355-73360
DOH113879-113880	OMH 13809-13817	DOH 73085-73101
DOH 113875-113878	OMH 13791-13796	DOH 73378-73396
DOH 113867-113873	DOH 127323-127324	DOH 73030-73046
DOH 113809-113819	DOH 127252-127253	DOH 72972-73006
DOH 113799-113808	DOH 127243-127243	DOH 73011-73029
DOH 113760-113777	OMH 18305-18311	DOH 73008-73010
DOH 113741-113742	DOH 81752-81852	DOH 72965-72970
DOH 113739-143740	DOH 84186-84197	DOH 72710-72717
DOH 113737-113738	OMH 11331-11335	DOH 71992-72119
DOH 913733-113736	OMH 11455-11528	DOH 72328-72391
DOH 113728-113732	OMH 11395-11454	DOH 72737-72751
DOH 105455-105470	DOH 81041-81127	OMH 9063-9065
DOH 105133-105147	OMH 11084-11086	DOH 72421-72427
DOH 1051187105132	OMH 11340-11345	DOH 72651-72672
DOH 105104-105117	DOH 111207-111217	DOH 72673-72682
DOH 105091-105103	DOH 111043-111044	DOH 72394-72406
DOH 105063-105075	DOH 55102-55104	DOH 72407-72418
DOH 104451-104478	DOH 73615-73617	DOH 72718-72724
OMH 6759-6762	DOH 73550-73609	DOH 72725-72734
OMH 9621-9621	DOH 73440-73456	DOH 72683-72709
DOH 12128-12155	DOH 73458-73474	DOH 75945-75945
OMH 7640-7645	DOH 73409-73418	DOH 78360-78360
DOH 71760-71764	DOH 73712-73753	DOH 78359-78359
DOH 71227-71227	DOH 73546-73548	DOH 78358-78358
DOH 71267-71267	DOH 73656-73703	DOH 78357-78357
DOH 71233-71239	DOH 73619-73638	DOH 78355-78356

Bates No.	Bates No.	Bates No.
DOH 78353-78354	DOH 78136-78139	DOH 77776-77776
DOH 78351-78352	DOH 78128-78135	DOH 77775-77775
DOH 78349-78350	DOH 78090-78127	DOH 77767-77774
DOH 78347-78348	DOH 78056-78067	DOH 77763-77766
DOH 78346-78346	DOH 77998-78018	DOH 77760-77762
DOH 78344-78345	DOH 77990-77997	DOH 77754-77759
DOH 78339-78343	DOH 77984-77989	DOH 77745-77753
DOH 78333-78338	DOH 77976-77983	DOH 77738-77744
DOH 78327-78332	DOH 77955-77975	DOH 77729-77737
DOH 78325-78326	DOH 77944-77954	DOH 77724-77728
DOH 78321-78324	DOH 77943-77943	DOH 77721-77723
DOH 78312-78320	DOH 77909-77942	DOH 77718-77720
DOH 78299-78311	DOH 77906-77908	DOH 77711-77717
DOH 78297-78298	DOH 77895-77905	DOH 77710-77710
DOH 78295-78296	DOH 77889-77894	DOH 77686-77709
DOH 78293-78294	DOH 77878-77888	DOH 77680-77685
DOH 78291-78292	DOH 77876-77877	DOH 77671-77679
DOH 78286-78290	DOH 77869-77875	DOH 77666-77670
DOH 78275-78285	DOH 77867-77868	DOH 77657-77665
DOH 78267-78274	DOH 77862-77866	DOH 77647-77651
DOH 78248-78266	DOH 77857-77861	DOH 77196-77197
DOH 78244-78247	DOH 77822-77856	DOH 77180-77195
DOH 78196-78233	DOH 77821-77821	DOH 77171-77179
DOH 78194-78195	DOH 77819-77820	DOH 77153-77170
DOH 78180-78193	DOH 77805-77818	DOH 77142-77152
DOH 78168-78179	DOH 77801-77804	DOH 77128-77141
DOH 78156-78167	DOH 77799-77800	DOH 77122-77127
DOH 78153-78155	DOH 77787-77798	DOH 77120-77121
DOH 78151-78152	DOH 77786-77786	DOH 77119-77119
DOH 78140-78150	DOH 77777-77785	DOH 77116-77118

Bates No.	Bates No.	Bates No.
DOH 77076-77114	DOH 76883-76884	DOH 76656-76664
DOH 77060-77075	DOH 76879-76882	DOH 76551-76634
DOH 77059-77059	DOH 76878-76878	DOH 76548-76550
DOH 77056-77058	DOH 76877-76877	DOH 76546-76547
DOH 77047-77055	DOH 76867-76875	DOH 76514-76545
DOH 77045-77046	DOH 76854-76866	DOH 76512-76513
DOH 77036-77043	DOH 76852-76853	DOH 76495-76511
DOH 76986-77035	DOH 76845-76851	DOH 76493-76494
DOH 76985-76985	DOH 76840-76844	DOH 76490-76492
DOH 76979-76984	DOH 76834-76839	DOH 76485-76489
DOH 76976-76978	DOH 76828-76833	DOH 76476-76484
DOH 76974-76975	DOH 76821-76827	DOH 76467-76475
DOH 76967-76967	DOH 76799-76820	DOH 76457-76459
DOH 76965-76966	DOH 76785-76798	DOH 76455-76456
DOH 76960-76964	DOH 76783-76784	DOH 76445-76454
DOH 76958-76959	DOH 76782-76782	DOH 76403-76404
DOH 76957-76957	DOH 76775-76781	DOH 76146-76193
DOH 76956-76956	DOH 76772-76774	DOH 76036-76103
DOH 76955-76955	DOH 76760-76771	DOH 75946-75946
DOH 76952-76954	DOH 76756-76759	DOH 77640-77646
DOH 76948-76951	DOH 76745-76749	DOH 77635-77639
DOH 76941-76943	DOH 76738-76744	DOH 77621-77634
DOH 76938-76940	DOH 76723-76737	DOH 77615-77620
DOH 76937-76937	DOH 76721-76722	DOH 77611-77614
DOH 76933-76936	DOH 76704-76720	DOH 77594-77610
DOH 76924-76932	DOH 76688-76703	DOH 77590-77593
DOH 76917-76923	DOH 76679-76687	DOH 77588-77588
DOH 76903-76914	DOH 76678-76678	DOH 77572-77586
DOH 76889-76902	DOH 76667-76676	DOH 77571-77571
DOH 76885-76888	DOH 76665-76666	DOH 77568-77569

Bates No.	Bates No.	Bates No.
DOH 77547-77567	OMH 992-1015	DOH 126193-126193
DOH 77533-77546	OMH 979-991	DOH 126022-126022
DOH 77532-77532	DOH 127938-127940	OMH 22752-22753
DOH 77520-77531	OMH 13585-13601	OMH 22726-22726
DOH 77518-77519	OMH 13005-13005	OMH 21961-21961
DOH 77514-77517	OMH 18287-18288	OMH 31142-31142
DOH 77513-77513	OMH 15979-15995	OMH 30993-30995
DOH 77510-77512	DOH 120907-120910	OMH 23027-23027
DOH 77490-77509	OMH 25255-25255	OMH 23019-23019
DOH 77473-77489	DOH 102546-102554	OMH 27799-27800
DOH 77463-77472	DOH 73762-73762	OMH 27770-27770
DOH 77461-77462	DOH 71865-71865	OMH 23075-23075
DOH 77449-77460	OMH 15962-15978	OMH 23074-23074
DOH 77421-77448	OMH 30426-30427	OMH 23073-23073
DOH 77419-77420	OMH 30420-30423	OMH 23071-23072
DOH 77403-77413	OMH 30352-30352	OMH 23063-23063
DOH 77399-77402	OMH 30310-30310	OMH 23054-23054
DOH 77361-77398	DOH 128340-128340	OMH 23053-23053
DOH 77299-77299	OMH 33710-33710	OMH 23050-23051
DOH 77295-77298	OMH 33384-33427	OMH 23049-23049
DOH 77294-77294	OMH 32238-32242	OMH 23048-23048
DOH 77278-77293	DOH 118696-118697	DOH 109706-109708
DOH 77269-77276	DOH 118405-118406	OMH 24484-24487
DOH 77266-77268	DOH 118401-118401	OMH 24476-24483
DOH 77256-77265	DOH 117672-117677	OMH 24454-24454
DOH 77238-77255	DOH 117493-117493	OMH 24375-24375
DOH 77233-77237	OMH 32077-32077	OMH 25638-25639
DOH 77232-77232	OMH 31954-31956	OMH 25637-25637
DOH 77229-77231	DOH 117469-117469	OMH 25571-25572
DOH 77228-77228	DOH 117450-117450	OMH 25413-25435

Bates No.	Bates No.	Bates No.
OMH 25170-25170	OMH 9193-9198	DOH 73397-73407
OMH 24855-24855	OMH 1275-1285	DOH 73047-73083
DOH 122288-122288	DOH 1 3 0 64-1 3 0 84	DOH 73127-73293
DOH 120138-120138	DOH 73103-73126	DOH 72962-72964
DOH 119095-119097	DOH 84125-84126	DOH 72752-72958
DOH 126846-126847	OMH 3328-3340	DOH 71883-71989
DOH 126449-126450	OMH 9056-9056	DOH 71813-71829
DOH 114115-114115	OMH 9761-9761	DOH 72121-72325
DOH 95807-95812	DOH 73549-73549	OMH 372-384
DOH 95635-95636	DOH 73297-73320	OMH 28406-28409
DOH 94057-94058	DOH 72960-72961	DOH 72451-72473
DOH 86318-86568	DOH 72120-72120	DOH 72428-72447
DOH 110305-110308	DOH 71991-71991	DOH 77044-77044
DOH 110261-110262	DOH 71745-71745	OMH 957-978
DOH 110258-110260	DOH 72393-72393	DOH 128025-128027
DOH 110254-110257	DOH 71758-71758	DOH 128000-128000
DOH 110251-110253	DOH 71882-71882	DOH 127969-127969
DOH 103995-104020	DOH 71759-71759	DOH 127897-127898
DOH 103969-103994	DOH 4048-4048	OMH 17501-17506
DOH 103943-103968	DOH 3221-3221	DOH 100720-100724
DOH 102115-102116	DOH 124999-124999	OMH 29788-29789
DOH 102112-102114	DOH 81854-82170	DOH 128219-128222
DOH 102109-102111	OMH 21416-21417	DOH 116697-116698
DOH 101902-101902	DOH 73763-73830	OMH 33705-33705
DOH 101891-101891	DOH 73756-73761	OMH 33242-33245
DOH 101867-101867	DOH 73611-73613	DOH 118774-118776
OMH 29219-29238	DOH 73510-73544	DOH 117610-117611
OMH 29162-29162	DOH 73475-73508	OMH 32066-32066
OMH 9793-9794	DOH 73420-73438	DOH 117322-117323
OMH 9211-9218	DOH 73342-73354	OMH 22040-22074

Bates No.
OMH 31186-31186
OMH 21523-21548
OMH 23002-23004
OMH 27373-27377
OMH 23052-23052
DOH 109690-109705
OMH 28410-28412
OMH 24451-24451
OMH 24216-24218
OMH 25670-25670
OMH 25608-25608
OMH 25356-25377
OMH 25285-25290
OMH 24853-24853
OMH 24823-24823
OMH 24820-24820
DOH 122046-122046
DOH 120253-120254

Bates No.
DOH 119059-119059
DOH 110263-110265
DOH 102168-102169
DOH 101967-101967
DOH 101963-101963
DOH 101845-101846
OMH 28416-28416
OMH 11087-11097
OMH 6244-6244
OMH 9828-9829
OMH 551-551
OMH 415-434
DOH 84127-84143
DOH 11959-11961
DOH 11973-11977
OMH 11855-11855
OMH 11603-11604
OMH 11597-11602

Bates No.
OMH 11570-11596
OMH 11529-11561
OMH 11346-11394
OMH 11139-11155
OMH 11103-11108
OMH 11102-11102
OMH 11098-11101
DOH 71830-71840
OMH 1023-1037
OMH 24681-24703
OMH 11856-11856
OMH 11109-11138
DOH 84144-84185
OMH 11337-11339
OMH 11162-11300
DOH 12617-12690
OMH 17276-17287

E. Jones - B

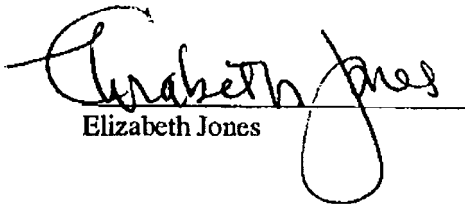
**REPLY REPORT IN THE MATTER OF
DISABILITY ADVOCATES, INC. v. PATAKI
03 CV 3209 (NGG)**

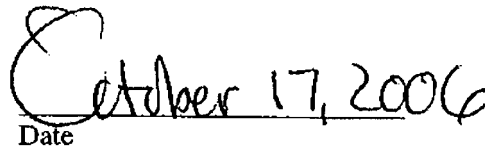
I have read Dr. Geller's report dated September 22, 2006. I also have read his notes about the adult home residents he reviewed in preparation for his report.

Subsequently, I read the adult home and day program records for one hundred twenty of the adult home residents in Dr. Geller's sample. (See Attachment 1.)

As a result of my review, I conclude that virtually all of the current adult home residents I reviewed from the sample could be served in supported housing or supported housing plus ACT.

Furthermore, I do not think that the adult home setting provides supports to the extent cited as necessary in Dr. Geller's report.


Elizabeth Jones


Date

ATTACHMENT 1

Anna Brika

Bayview Manor

Belle Harbor Manor

Brooklyn Manor

Elm-York

Garden of Eden

Mermaid Manor

Ocean House

Oceanview Manor

Park Inn

Queens Adult Care Center

Riverdale Manor

Sanford House

Surf Manor

Surfside Manor

RESUME

ELIZABETH JONES

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EDUCATION

Web-based Certificate Course in Supported Employment, Virginia Commonwealth University, Rehabilitation Research and Training Center on Workplace Supports, Richmond, VA, 2002.

Program for Senior Executives in the Commonwealth of Massachusetts, Kennedy School of Government, Cambridge, MA, 1983.

Master of Science, Labor Studies, University of Massachusetts, Amherst, Labor Relations and Research Center, 1982. Thesis focused on the Rhode Island Labor/Management agreement regarding the transfer of public employees from institutional to community-based programs.

Graduate work (20 credit hours) in Educational Psychology, Georgia State University, Atlanta, GA, 1976-77.

Bachelor of Arts, English, University of California at Santa Barbara, 1972.

WORK EXPERIENCE

February 10, 2004 to present: **Court Monitor**
 Washington, DC

Appointed as Court Monitor in federal court class action litigation, Evans v. Fenty, brought to compel the development of community-based, individualized services/supports for former residents of the District-operated Forest Haven institution (now closed) for children and adults with mental retardation/developmental disabilities. Responsibilities include oversight of all monitoring activities, management of the Court Monitoring Office, reporting to the federal court, and working with the parties to identify issues/concerns affecting compliance with longstanding court orders and agreements.

November 5, 2003 to December 31, 2004: Receiver
Riverview Psychiatric Center/Augusta
Mental Health Institute
Augusta, ME

Appointed by the Maine Superior Court in the Bates v. Harvey case, class action litigation brought in 1989 to ensure the provision of mental health treatment to current and former clients of the Augusta Mental Health Institute. Responsibilities included oversight of all Hospital management and operations; preparation and implementation of a work plan that will lead to compliance with the Consent Decree and monthly reporting to the Court. The Receivership was vacated by the Law Court of Maine in December 2004.

August 1, 2001 to February 10, 2004: Senior Planner
District of Columbia
Department of Mental Health
Washington, DC

Within the newly formed Department of Mental Health, responsible for planning systemic initiatives that improve the quality of care/treatment for individuals with serious mental illness. Major responsibility for the Department's evidence-based supported employment initiative including the Ticket to Work; development of core curriculum for employment specialists; implementation of the Johnson & Johnson-Dartmouth Community Mental Health Program grant award; data analysis of existing employment services; restructuring employment models no longer considered consistent with best practices; and interagency collaboration to expand employment options for adults and youth with serious mental illness/emotional disturbance. Additionally, exercised major responsibility for interagency efforts to improve services/supports for those clients with a dual diagnosis of mental illness/mental retardation.

June 1, 2000 to August 1, 2001: Chief Operating Officer
District of Columbia
Commission on Mental Health Services
Washington, DC

April 1, 2000 to June 1, 2000: Acting Chief Operating Officer

Under the direction of the Transitional Receiver, responsible for the day to day operations of the Commission including supervision of all administrative and programmatic functions; working with other government agencies and providers of services/supports to the Commission and its clients; collaborating with consumer groups, advocates, family groups and other interested parties to strengthen the mental health system's responsiveness and effectiveness in meeting its mandates; participating in the design and implementation of systemic reform initiatives; overseeing the investigation and resolution of concerns impeding the delivery of services/supports of the highest possible quality.

February 1998 to April 2000:

**Hospital Director
St. Elizabeths Hospital
Washington, DC**

Overall management responsibility for the Acute Care and Continuing Care programs of a public psychiatric hospital then under federal court receivership pursuant to orders in the Dixon v. Fenty case, a longstanding class action lawsuit mandating the development of a comprehensive community based mental health system.

Responsibilities included direction and oversight of the provision of active treatment to approximately 375 clients; identification of appropriate community services for individuals no longer requiring stabilization in an inpatient setting; management of personnel and budget; work with advocates, families, legal representatives, community providers, community advocacy groups and public officials. As member of the senior executive staff, responsible for working with the Receiver and colleagues to design, implement and evaluate strategies for systemic reform. Also responsible for the overall management of the CarePoint Project, an initiative designed to substantially reform and improve the provision of individualized services and supports.

June 1990 to February 1998:

**Executive Director
Maryland Disability Law Center
Baltimore, MD.**

The Maryland Disability Law Center is a public interest law firm funded mainly through federal and state grants and contracts. Pursuant to federal law, it has been designated since 1977 as the Protection and Advocacy System for the State of Maryland. Reporting to an independent Board of Directors, responsibilities as Executive Director included supervision of thirty-six staff including thirteen attorneys and nine paralegals and management of a two million dollar budget. Responsibilities also included planning, program implementation, liaison with advocacy groups and state agencies, public relations and playing a key role in the disability and public interest community.

July 1986 to June 1990:

**Coordinator
Dixon Implementation Monitoring Committee
Washington, D.C.**

Coordinator for the Dixon Committee, a monitoring group established in 1980 by Federal District Judge Aubrey Robinson in the Dixon v. Fenty lawsuit. The Committee was mandated to receive and analyze defendant's reports and factual investigations; screen and investigate complaints; oversee and report on the progress of the implementation of the Court's decrees. Responsibilities as Coordinator included advising plaintiffs' attorneys at the Mental Health Law Project (now the Bazelon Center for Mental Health Law) and at Covington and Burling on programmatic issues; serving as a liaison between the Committee and its attorneys as necessary; community organizing; conducting site

visits; designing public education strategies; extensive public speaking; working with the media; fundraising; and developing and managing student internships with local colleges and universities.

December 1983 to July 1986:

**District Manager
Department of Mental Health
Northampton, Massachusetts**

Chief Executive Officer for five mental health and mental retardation service areas (total population 800,000). Exercised responsibility for an approximately sixty million-dollar budget. Overall responsibility for the implementation of the Brewster decree, a landmark federal court order governing the use of Northampton State Hospital and the development of community programs for people with mental illness. Extensive experience in working with organized labor, private provider agencies, local and state government officials consumer and family advocates, the media and a wide spectrum of community groups interested in the mental health system and the implementation of necessary systemic reforms.

Management responsibilities also included planning; program development; program implementation; supervision of senior staff; community relations; dispute settlement; interagency coordination; budget preparation; oversight and monitoring; designation as appointing authority for all area-based state employees.

September 1983 to December 1983:

**Director of Planning, Development and
Compliance
Belchertown State School
Belchertown, Massachusetts**

Oversaw Belchertown State School's compliance with federal, state and court mandates; coordinated all responses and compliance plans for the court under the Ricci v. Greenblatt decree and for federal Medicaid. Worked with local and state officials and agencies on issues related to the present and future uses of state school property; developed long-range initiatives for the use of state school resources; designed and implemented tools, methods and techniques for monitoring service delivery at the State School; designed and implemented training in quality assurance for staff at all levels of the organization.

August 1982 to September 1983:

**Acting Superintendent
Belchertown State School
Belchertown, Massachusetts**

Overall management responsibility for the direction of a large residential facility for individuals with mental retardation. Responsibilities included the implementation of a consent decree resulting from a federal class action lawsuit, Ricci v. Greenblatt. Management functions also included personnel authority over 1,400 staff; supervision of senior staff; oversight of budget preparation and spending for direct resources of over

twenty-eight million dollars in state and federal funds; labor relations; community relations; participation in the planning and implementation of community programs for clients with mental retardation in District I; and planning on statewide issues. Initiated the development of self-advocacy programs for the residents of Belchertown State School.

Worked as a primary member of the regional senior management team to plan and ensure the implementation of all necessary reforms in the provision of mental health and mental retardation services to residents of Western Massachusetts and their families. Worked with senior management colleagues to design, coordinate and evaluate policies and program standards for all components of the systems in Western Massachusetts as mandated by two federal court ordered consent decrees.

October 1977 to August 1982: **Director of Employee Services**
 Belchertown State School
 Belchertown, Massachusetts

Responsible for the direct management and administration of all personnel, staff development and employee assistance programs. Responsible for labor/management activities including participation in state and national initiatives. Regional responsibilities included the development and support of staff development offices and programs. Co-investigator for a federal grant on training and manpower development from 1979-80.

Worked as a member of the regional management team responsible for the design, coordination and evaluation of staff development strategies for mental health and mental retardation programs in Western Massachusetts as stipulated in two court ordered consent decrees.

April 1977 to October 1977: **Community Residential Services Consultant**
 State of Georgia
 Division on Mental Health and Mental
 Retardation
 Atlanta, Georgia

Responsible for the statewide planning and monitoring of community residential services for people with mental retardation, including those with a dual diagnosis of mental illness, particularly those in transition from institutional settings. Designed specific plans and processes for the placement of five hundred clients from state institutions throughout Georgia.

July 1976 to April 1977: **Advocacy Specialist**
 Advocacy Planning Project
 Atlanta Association for Retarded Citizens
 Atlanta, Georgia

Responsible for the statewide design and implementation of a protection and advocacy system for people with developmental disabilities as specified in Public Law 94-103. Activities included the planning and implementation of public hearings throughout Georgia.

July 1975 to July 1976:

**Community Services Consultant
State of Georgia
Division of Mental Health and Mental
Retardation
Atlanta, Georgia**

Supervision of community services workers monitoring the placement of people with mental retardation who had returned to the Atlanta area from state institutions.

April 1974 to July 1975:

**Cottage Life Supervisor
Georgia Mental Health Institute
Atlanta, Georgia**

Supervisor of staff working in a transitional living unit for adults with mental retardation, including those with a dual diagnosis of mental illness, previously institutionalized in state facilities.

November 1973 to April 1974:

**Assistant Teacher
Georgia Center for the
Multihandicapped
DeKalb County Schools
Atlanta, Georgia**

Assisted in the evaluation of school-aged children with multiple disabilities, including deafness and/or blindness. Assisted in the coordination of community-based services for these children in order to support their individual and family needs.

January 1971 to October 1971:

**Editorial Assistant
Department of Anthropology
University of Turin
Turin, Italy**

Editing of manuscripts on primate classification. Editing and preparation of journal articles on genetics for the Academic Press, London. Teaching of English to graduate students at the University of Turin.

January 1969 to June 1970

**Board of Education
Dayton, Ohio**

Teacher of remedial class for seventh and eighth grade inner city children bused to suburban school to meet desegregation mandates.

CONSULTATION

Illinois: Expert consultant in Williams v. Blagojevich, class action case brought on behalf of individuals with mental illness who are confined to nursing homes.

Connecticut: Expert consultant in State of Connecticut Office of Protection and Advocacy for Persons with Disabilities v. The State of Connecticut, litigation brought on behalf of residents with mental illness who are confined to three nursing homes.

Maine: Consultant to the Court Master in Bates v. Harvey (January 2005-present). Consultant to the State Department of Health and Human Services regarding mental health services related to achieving compliance in the Bates v. Harvey case (February-June 2006).

New York: Expert consultant in Disability Advocates, Inc. v. Pataki, litigation brought on behalf of the residents of adult board and care homes in New York City (June 2004-present).

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Bulgaria: In collaboration with Amnesty International and Mental Disability Rights International, expert for the Bulgaria Helsinki Committee. Visited eight institutions for children and adults with mental retardation and/or mental illness in order to provide recommendations for systemic reform. Guest presenter at the Bulgarian Psychiatric Association's annual conference (October 2001-2002).

Massachusetts: Expert for the plaintiffs in Rolland v. Celluci (1999-2004). Case involves the right to habilitation for individuals with mental retardation/developmental disabilities confined to nursing homes.

Ireland: Guest lecturer to students/faculty at the Center for the Study of Developmental Disabilities, University College of Dublin, in contemporary issues in the field of mental retardation (1999-2003).

Pennsylvania: Consultant for the Special Master in Halderman v. Pennhurst (May 1996-January 1997).

Romania: Consultant for Mental Disability Rights International on the development of services/supports for people with mental retardation (November 1995-1997).

District of Columbia: Expert for the Department of Justice, Plaintiff-intervenor in Evans v. Fenty, a class action lawsuit filed in federal court on behalf of individuals with a developmental disability institutionalized at Forest Haven (February 1995-May 1995).

Massachusetts: Expert for the Defendants regarding the implementation of the consent decrees regarding the state schools (1992).

Texas: Expert for the Plaintiffs in Leslz v. Kavanagh, a class action lawsuit regarding the rights of individuals with mental retardation residing in institutions funded by the State of Texas (1991-1992).

North Dakota: Consultant for the Protection and Advocacy System regarding systemic issues affecting individuals with mental illness institutionalized in state psychiatric facilities (1992).

Iowa: Expert for the Plaintiffs in O'Connor v. Branstad, a class action lawsuit on behalf of individuals with mental retardation residing in two state schools (May 1989 to 1994).

New Mexico: Expert witness in Robbins et al. v. Budke, a class action case concerning access of the Protection and Advocacy System to a state hospital (December 1989).

Michigan: Expert witness in Kope v. Watkins, a class action lawsuit on behalf of individuals with mental retardation living in nursing homes (January 1989-1993).

Louisiana: Consultant to the Special Master in the Gary W. case in the New Orleans region (Spring 1986).

England and Wales: Consultant on the development of mental retardation services for the Sheffield Health Authority, Manchester Health Authority and NINROD of Cardiff, Wales (October 1984).

Prior Work in Other Litigation

In DAI v. Pataki, Monaco v. Carpinelli, and Sparks v. Seltzer, I was deposed.

In Rolland v. Celluci, I provided deposition and trial testimony.

In Robbins et al. v. Budke, I provided trial testimony.

E. Jones - C

RESUME

ELIZABETH JONES

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elzjns@aol.com

EDUCATION

Web-based Certificate Course in Supported Employment, Virginia Commonwealth University, Rehabilitation Research and Training Center on Workplace Supports, Richmond, VA, 2002.

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 Atlanta, Georgia

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July 1975 to July 1976:

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Supervision of community services workers monitoring the placement of people with mental retardation who had returned to the Atlanta area from state institutions.

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Assisted in the evaluation of school-aged children with multiple disabilities, including deafness and/or blindness. Assisted in the coordination of community-based services for these children in order to support their individual and family needs.

January 1971 to October 1971:

**Editorial Assistant
Department of Anthropology
University of Turin
Turin, Italy**

Editing of manuscripts on primate classification. Editing and preparation of journal articles on genetics for the Academic Press, London. Teaching of English to graduate students at the University of Turin.

January 1969 to June 1970

**Board of Education
Dayton, Ohio**

Teacher of remedial class for seventh and eighth grade inner city children bused to suburban school to meet desegregation mandates.

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Massachusetts: Expert for the plaintiffs in Rolland v. Celluci (1999-2004). Case involves the right to habilitation for individuals with mental retardation/developmental disabilities confined to nursing homes.

Ireland: Guest lecturer to students/faculty at the Center for the Study of Developmental Disabilities, University College of Dublin, in contemporary issues in the field of mental retardation (1999-2003).

Pennsylvania: Consultant for the Special Master in Halderman v. Pennhurst (May 1996-January 1997).

Romania: Consultant for Mental Disability Rights International on the development of services/supports for people with mental retardation (November 1995-1997).

District of Columbia: Expert for the Department of Justice, Plaintiff-intervenor in Evans v. Fenty, a class action lawsuit filed in federal court on behalf of individuals with a developmental disability institutionalized at Forest Haven (February 1995-May 1995).

Massachusetts: Expert for the Defendants regarding the implementation of the consent decrees regarding the state schools (1992).

Texas: Expert for the Plaintiffs in Leslz v. Kavanagh, a class action lawsuit regarding the rights of individuals with mental retardation residing in institutions funded by the State of Texas (1991-1992).

North Dakota: Consultant for the Protection and Advocacy System regarding systemic issues affecting individuals with mental illness institutionalized in state psychiatric facilities (1992).

Iowa: Expert for the Plaintiffs in O'Connor v. Branstad, a class action lawsuit on behalf of individuals with mental retardation residing in two state schools (May 1989 to 1994).

New Mexico: Expert witness in Robbins et al. v. Budke, a class action case concerning access of the Protection and Advocacy System to a state hospital (December 1989).

Michigan: Expert witness in Kope v. Watkins, a class action lawsuit on behalf of individuals with mental retardation living in nursing homes (January 1989-1993).

Louisiana: Consultant to the Special Master in the Gary W. case in the New Orleans region (Spring 1986).

England and Wales: Consultant on the development of mental retardation services for the Sheffield Health Authority, Manchester Health Authority and NINROD of Cardiff, Wales (October 1984).

Prior Work in Other Litigation

In DAI v. Pataki, Monaco v. Carpinelli, and Sparks v. Seltzer, I was deposed.

In Rolland v. Celluci, I provided deposition and trial testimony.

In Robbins et al. v. Budke, I provided trial testimony.